

LANKLER & CARRAGHER, LLP

ATTORNEYS AT LAW

April 4, 2008

Via Hand Delivery

MEMO ENDORSED

Honorable Richard M. Berman
United States District Court Judge
Southern District of New York
40 Centre Street, Courtroom 706
New York, New York 10007-1312

Re: Automated Teller Machine Advantage LLC et al. v. Vance Moore, Jr. et al.
Index No.: 08-CV-3340(RMB)(FM)

*The Court provides no mud
for 9,000 pp of exhibits
at this time. 144 pp complaint
should be more than enough
to put do/s on mtns of
pls' complaint. Court agrees with
the Clerk.*

SO ORDERED:
Date: 4/4/08 *Richard M. Berman*
Richard M. Berman, U.S.D.J.

Dear Judge Berman:

This firm represents plaintiffs in the above-referenced matter (the "Action") before your Honor. Please find enclosed a courtesy copy of the complaint, exhibit appendices and a Fed. R. Civ. P. 7.1 Statement.

Upon filing the complaint with the Clerk of the Court yesterday, we were advised to contact the Court to seek guidance on filing the exhibits to the complaint, which number roughly 9,000 pages. Accordingly, further to a telephone conversation my office had with Chambers today, I write to explain why plaintiffs require such a voluminous set of exhibits to the complaint.

The Action is predicated upon *inter alia* allegations of fraud and civil RICO violations, which the plaintiffs therein have endeavored to plead with sufficient particularity. Specifically, plaintiffs allege that the defendants have engaged in a scheme to defraud plaintiffs of roughly \$16,475,000 by virtue of inducing the plaintiffs to invest money in a series of deals to purchase ATM machines through the defendants. Plaintiffs have therefore included as exhibits to the complaint documents evidencing these transactions, and the defendants' fraudulent conduct.

Please let me know if you have any questions or if I can provide anything further for the Court's convenience.

Thank you for your consideration in this matter.

Very truly yours,


Andrew M. Lankler

Enclosures

